



*Handwritten signature/initials*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

**'08 MJ 87 05**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Jose AHUMADA-Navarrete

Defendant.

Magistrate Case No.:

COMPLAINT FOR VIOLATION OF

21 U.S.C. § 952 and 960

Importation of a Controlled Substance  
(Felony)

The undersigned complainant being duly sworn states:

That on or about August 7, 2008, within the Southern District of California, Jose AHUMADA-Navarrete did knowingly and intentionally import approximately 28.22 kilograms (62.08 pounds) of cocaine, a Schedule II Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

*Signature*  
Special Agent  
U.S. Immigration & Customs  
Enforcement

SWORN TO, BEFORE ME, AND SUBSCRIBED IN MY PRESENCE THIS 8<sup>th</sup>  
DAY OF August, 2008.

*Signature*  
PETER C. LEWIS  
U.S. MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

2 v.

3 Jose AHUMADA-Navarrete

4 STATEMENT OF FACTS

5 This complaint is based upon the personal observations, investigation and  
6 information provided to U. S. Immigration and Customs Enforcement Special Agent  
7 Douglas Struckmeyer.

8 On August 7, 2008, Jose AHUMADA-Navarrete entered the United States at the  
9 Calexico, California, West Port of Entry. AHUMADA was the driver and sole occupant  
10 of a 2007 Chevrolet Tahoe registered in his name.

12 Canine Enforcement Officer (CEO) J. Jones was conducting pre-primary  
13 operations with his Narcotic Detector Dog (NDD). CEO Jones noticed that AHUMADA  
14 was positioned with at least two car lengths between his vehicle and the vehicle in front  
15 of his. As CEO Jones approached AHUMADA's vehicle with his NDD, AHUMADA  
16 suddenly pulled forward and closed the gap, pulling away from CEO Jones. As he did  
17 this, CEO Jones' NDD ran to the rear of the vehicle and alerted to the rear cargo area,  
18 indicating the presence of the odor of a controlled substance in that area.

21 CEO Jones escorted AHUMADA through primary inspection lane 3. Customs  
22 and Border Protection Officer (CBPO) R. Castillo conducted a primary inspection of  
23 AHUMADA and the vehicle. CBPO Castillo received a negative Customs declaration  
24 from AHUMADA. AHUMADA told CBPO Castillo he was entering the United States in  
25 order to purchase DVD's and DVD carriers.

27 CBPO L. Ledbetter responded to Lane 3 and escorted AHUMADA to the vehicle  
28 secondary area for further inspection. CBPO Ledbetter received a negative Customs  
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1 declaration from AHUMADA. AHUMADA told CBPO Ledbetter that he was entering the  
2 United States in order to go to the bank.

3 CEO Jones began the secondary inspection of the vehicle. He inserted a probe  
4 into a small hole in the side of the wheel well and a white powder was produced. CBPO  
5 Ledbetter field-tested the substance, which tested positive for cocaine. Further  
6 inspection of the vehicle revealed a non-factory compartment in the rear floor of the  
7 vehicle. Concealed within the compartment were 25 packages. The total gross weight  
8 of the packages was approximately 28.22 kilograms (62.08 pounds). A sample taken  
9 from one of the packages field tested positive for cocaine.  
10

11 AHUMADA claimed that he purchased the vehicle in April, 2008. The vehicle's  
12 registration indicates that he registered the vehicle on May 13, 2008. Record checks  
13 indicate that he entered the United States in the vehicle through the Calexico West Port  
14 of Entry four times between May 22, 2008 and June 5, 2008. Record checks also  
15 indicate, however that the vehicle crossed into the United States through the Calexico  
16 West Port of Entry five more times between June 28 and August 3, but there is no  
17 record of AHUMADA making any entries during that same time period.  
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